

6/30/2016

Public comment on the Proposed Plan for Amending the Records of Decision for the Wyckoff/Eagle Harbor Superfund Site (Operable Units 1, 2, and 4) on Bainbridge Island

Thank you for the opportunity to contribute comments on the alternatives proposed to treat or extract the NAPL at the old Wyckoff wood-treatment facility.

As a resident of Bainbridge Island I am concerned about the alternatives presented for treating the NAPL contaminated area at the Wyckoff Superfund site, particularly for the upland area. One of my biggest concerns regarding these alternatives is protecting the underlying aquitard, which is very thin or not present in areas (e.g., southeast upland region, Figure 1-11 reference ** below). **My vote is for the alternative that maximally extracts NAPL, is least intrusive to the aquitard, and does not rely on the sheet pile wall to contain the contaminated ground water.** Also, I am concerned about the new sheet pile wall. The current one is likely to fail within 10-15 years, and according to Figure 1-3 (reference ** below), the wall is approximately 60 ft deep. The new wall design is for 30 ft deep (alternative 4) or for 38 ft deep (alternatives 5-7). Does the new wall tie into the old wall? Given the amount of deep NAPL, it seems conservative to design the new wall to match the old wall in depth, plus make the new wall resilient to earthquakes? Which alternative would protect the public and wildlife from NAPL contaminants (non-aqueous and aqueous) in the event of an earthquake?

My concerns regarding the different alternative options:

Option 4: The ISS methodology (also in options 5 & 7)

- 1) does not remove the contaminants,
- 2) has a shallower Sheet Pile Wall (30 feet) than options 5, 6, and 7 (38 feet deep),
- 3) has a questionably high percent of NAPL treated (93%); this high percentage is unlikely due to the depth of some locations, debris (including glacial till), and geometry. By geometry, I am referring to the round bore holes, which would leave surrounding areas untreated. Do the untreated areas add up to 7%?,
- 4) intrudes on the aquitard (Fig 1-8; see reference **below),
- 5) is permanent, which makes additional treatment of the upper aquifer very difficult, and it
- 6) would make the lower aquifer inaccessible to future cleanup actions.

Option 5 and 7: The mixed models of using ISS and extraction seems more reasonable than option 4, yet for the same reasons listed under option 4, there are drawbacks, most especially-- the risk to the aquitard, where the aquitard is thin (preliminary drawing: ISS isopatch, pg 213 in reference ** below); the suggested revision of the steel wall to be built on the outside of the current wall does not state a depth--- what is it?

Option 6 is the most desirable option: This approach extracts the contaminants, and I think that this approach is least intrusive to the aquitard. By removing the contaminants, there is less reliance on the Sheet pile wall to contain the aqueous contaminants (consider a possible earthquake). Plus, the individual treatment locations provide placement flexibility.

**Non-Aqueous Phase Liquid Focused Feasibility Study for the Soil and Groundwater Operable Units (OU2/OU4) Wyckoff/Eagle Harbor Superfund Site, Bainbridge Island, WA

Thank you,

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